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6 *Attorney for Plaintiff*

7
 8 UNITED STATES DISTRICT COURT
 9 DISTRICT OF NEVADA

10 GATEWAY INSURANCE COMPANY, a
 11 Missouri corporation,

12 Plaintiff,

13 vs.

14 ALEXANDER FERNANDEZ-LEON, an
 individual; YENDRY HERNANDEZ-
 15 ECHEVARRIA, an individual; GRETSIN
 CONSUEGRA SORIANO, an individual;
 16 JUAN SCHUEG-CASTRO, an individual;
 JOSE PRIETO-HERNANDEZ, an individual;
 17 NELLIS CAB LLC, OPERATION SERIES
 NELLIS CAB LLC, VEH. SERIES 102, a
 18 Nevada series limited liability company,

19 Defendants.

Case No.: 2:19-cv-00771-APG-BNW

**STIPULATION AND ORDER TO
 EXTEND DEADLINES FOR REPLY
 IN SUPPORT OF MOTION FOR
 STAY AND FOR OPPOSITION TO
 MOTION TO DISMISS**

(Second Request)

20 Plaintiff Gateway Insurance Company (“Plaintiff”) by and through its counsel of record,
 21 Scott A. Flinders and Todd W. Prall of the law firm Hutchison & Steffen, PLLC, and
 22 Defendants Yendry Hernandez-Echevarria, Gretsin Consuegra Soriano, Juan Schueg-Castro,
 23 and Jose Prieto-Hernandez (“Defendants”), by and through their counsel, Joseph A. Gutierrez
 24 and Stephen G. Clough of Maier Gutierrez and Associates, and hereby stipulate and agree to
 25 extend the time to file a reply in support of Plaintiff Gateway Insurance Company’s Notice
 26 and/or Motion for Stay Due to Gateway Insurance Company’s Liquidation (“Motion for Stay”)
 27 (Doc. #56), which Defendants opposed (Doc. #57), and an opposition to Defendants’
 28 Countermotion to Dismiss for Want of Prosecution (“Countermotion”) (Doc. #58) to August

1 27, 2020. The Plaintiff and Defendants have agreed to dismiss this action without prejudice,
2 but would prefer that all parties who have appeared agree to the dismissal without prejudice.
3 Nellis Cab, LLC has appeared, but the counsel of record has no authority fro the client and new
4 counsel needs to appear in order to enter into a stipulation. Plaintiff and Defendants have
5 obtained information concerning a potential new counsel for Nellis Cab, LLC, and need more
6 time to allow new counsel to substitute in and sign off on the stipulation or, if new counsel has
7 no authority to enter an appearance, Plaintiff and Defendants can take other steps to dismiss the
8 case. The parties request an extension to give the parties time to complete a stipulation to
9 dismiss the action without prejudice and avoid any further fees in motion practice. This is the
10 second request to extend time to file the reply to the motion for stay and opposition to the
11 motion to dismiss.

12 Pursuant to Local Rule 6-1(B), the parties hereby aver that this is the second extension
13 requested concerning these deadlines and is not sought for the purposes of delay.

14 Plaintiff and Defendants, therefore stipulate as follows:

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1 1. That Plaintiff shall have until August 27, 2020 to file a reply in support of the its
2 Motion for Stay (Doc. #56).

3 2. That Plaintiff shall have until August 27, 2020 to file an opposition to the
4 Countermotion (Doc. #58).

5 DATED this 13th day of August, 2020.

 DATED this 13th day of August, 2020.

6 HUTCHISON & STEFFEN, PLLC

 MAIER GUTIERREZ & ASSOCIATES

7
8 /s/ Todd W. Prall

/s/ Stephen G. Clough

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15 *Attorneys for Plaintiff*

*Attorneys for Defendants Yendry
 Hernandez-Echeverria, Gretsin
 Consuegra Soriano, Juan Schueg-Castro,
 and Jose Preto-Hernandez*

16 IT IS SO ORDERED

17 
18 United States District Judge

19 Dated: August 14, 2020
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